

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| In re: FIELDWOOD ENERGY LLC, <i>et al.</i>, Debtors.¹ | § § § § § § § | Chapter 11 Case No. 20-33948 (MI) (Jointly Administered) |
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**NOTICE OF SECOND AMENDED AGENDA OF MATTERS SET FOR
HEARING ON APRIL 9, 2021 AT 2:00 P.M. (CST)**

The above-referenced debtors and debtors in possession (collectively, the “**Debtors**”) hereby file their Agenda of Matters Set for Hearing on **April 9, 2021 at 2:00 p.m. (CST)** before the Honorable Marvin Isgur.

I. UNCONTESTED MATTERS:

1. Debtors’ Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code (ECF No. 930)

Status: This matter is going forward on an uncontested basis.

Resolved Objections:

- A. Objection of Eni Petroleum US LLC and Eni US Operating Co. Inc. to Debtors’ Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code **(ECF No. 1093)**;
 - **Notice of Withdrawal of Objection (ECF No. 1228)**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

- B. Objection of XTO Offshore, Inc., HHE Energy Company, and XH LLC to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code (**ECF No. 1091**);
 - **Notice of Withdrawal of Objection Filed (ECF No. 1231)**
- C. Joinder of North American Specialty Insurance Company in Objection to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) (**ECF No. 1126**);
 - **Withdrawn by email to Debtors' counsel on April 9, 2021**
- D. Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company, and Sirius America Insurance Company's (I) Objection to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code and (II) Joinder to (A) Objection of XTO Offshore, Inc., HHE Energy Company, and XH LLC to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code and (B) Objection of Eni Petroleum US LLC and ENI US Operating Co. Inc. to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code (**ECF No. 1129**);²
- E. Joinder of Lexon Insurance Company, Ironshore Indemnity Inc., Endurance American Insurance Company and Ironshore Specialty Insurance Company to the Objection of Eni Petroleum US LLC and ENI US Operating Co. Inc. to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code (**ECF No. 1137**);
 - **Withdrawn by email to Debtors' counsel on April 9, 2021**
- F. JX Nippon Oil Exploration (U.S.A.) Limited's Joinder in Objection of XTO Offshore, Inc., HHE Energy Company, and XH LLC to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code (P-1091) and Objection of Eni Petroleum US LLC and ENI US Operating Co. Inc. to Debtors' Second Motion for Entry of an Order

² Upon information and belief, Aspen does not intend to move forward with its objection, but reserves all of its rights with respect to the Plan and any confirmation related issues.

Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code (P-1093) (**ECF No. 1142**);

- **Notice of Withdrawal of Objection Filed (ECF No. 1241)**

Related Documents:

- G. Debtors' Reply in Support of Second Motion for Entry of an Order Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code (**ECF No. 1235**)

Witness and Exhibit List:

- H. Debtors' Witness and Exhibit List for Hearing on April 9, 2021 (**ECF No. 1225**)

2. Emergency Motion of Debtors for Order (I) Authorizing Entry Into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief (ECF No. 1023)

Status: This matter is going forward on an uncontested basis.

Resolved Objections:

- A. Objection of Eni US Operating Co. Inc. and Eni Petroleum US LLC to Approval of Emergency Motion of Debtors for Order (I) Authorizing Entry Into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief (**ECF No. 1110**);

- **Notice of Withdrawal of Objection filed (ECF No. 1228)**

- B. Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company, and Sirius America Insurance Company's (A) Objection to Emergency Motion of Debtors for an Order (I) Authorizing Entry into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief and (B) Joinder to Objection of Eni US Operating Co. Inc. and Eni Petroleum US LLC to Approval of Emergency Motion of Debtors for Order (I) Authorizing Entry Into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief (**ECF No. 1128**);³

³ Upon information and belief, Aspen does not intend to move forward with its objection, but reserves all of its rights with respect to the Plan and any confirmation related issues.

C. Joinder of Lexon Insurance Company, Ironshore Indemnity Inc., Endurance American Insurance Company and Ironshore Specialty Insurance to the Objection of ENI US Operating Co. Inc. and ENI Petroleum US LLC to Approval of Emergency Motion of Debtors for Order (I) Authorizing Entry into Backstop Commitment, (II) Approving Obligations Thereunder, and (III) Granting Related Relief (**ECF No. 1136**);

- **Withdrawn by email to Debtors' counsel on April 9, 2021**

D. JX Nippon Oil Exploration (U.S.A.) Limited's Joinder in Objection of Eni US Operating Co. Inc. and Eni Petroleum US LLC to Approval of Emergency Motion of Debtors for Order (I) Authorizing Entry Into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief (P-1110) (**ECF No. 1143**);

- **Notice of Withdrawal of Objection filed (ECF No. 1241)**

Replies:

E. Ad Hoc Group's Statement in Support of the Debtors' (A) Motion and Reply in Support of the Disclosure Statement and (B) Emergency Motion for Order (I) Authorizing Entry Into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief (**ECF No. 1125**)

Related Documents:

F. Declaration of John-Paul Hanson in Support of Emergency Motion of Debtors for Order (I) Authorizing Entry Into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief (**ECF No. 1024**)

G. Notice of Adjournment on Emergency Motion of Debtors for Order (I) Authorizing Entry Into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief (**ECF No. 1039**)

H. Notice of Proposed Schedule (**ECF No. 1179**)

I. Scheduling Order (**ECF No. 1224**)

J. Notice of Filing of Joinder and Amendment to Backstop Commitment Letter (**ECF No. 1238**)

Witness and Exhibit Lists:

- K. Debtors' Amended Witness and Exhibit List for Hearing on March 24, 2021 **(ECF No. 1138)**; amends Debtors' Witness and Exhibit List for Hearing on March 24, 2021 **(ECF No. 1083)** amends Debtors' Witness and Exhibit List for Hearing on March 24, 2021 **(ECF No. 991)**
- L. Amended Exhibit and Witness List of Eni Petroleum US LLC and Eni US Operating Co. Inc. for Disclosure Statement and Backstop Hearing Set for March 24, 2021 at 1:30 p.m. **(ECF No. 1081)**; amends Exhibit and Witness List of Eni Petroleum US LLC and Eni US Operating Co. Inc. for Disclosure Statement for March 15, 2021 at 11:00 a.m. **(ECF No. 974)**
- M. Notice of Exhibits and Witnesses to be Offered by Lexon Insurance Company, Ironshore Indemnity Inc. and Ironshore Specialty Insurance Company at the March 21, 2021 Hearing **(ECF No. 1089)**; amends Lexon Insurance Company, Ironshore Indemnity Inc. and Ironshore Specialty Insurance Company Witness and Exhibit List **(ECF No. 977)**; amends Lexon Insurance Company and Endurance American Insurance Company's Witness and Exhibit List **(ECF No. 968)**
- N. Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company and Sirius America Insurance Company's Collective Amended Witness and Exhibit List for March 24, 2021 Video/Telephonic Hearing **(ECF No. 1063)** amends Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company, Sirius America Insurance Company Witness and Exhibit List **(ECF No. 1031)**
- O. Ad Hoc Group of Secured Lenders' Witness and Exhibit List for Hearing on March 24, 2021 at 1:30 P.M. **(ECF No. 1086)**
- P. BP Exploration & Production Inc.'s Witness and Exhibit List **(ECF No. 1092)**
- Q. Debtors' Witness and Exhibit List for Hearing on April 9, 2021 **(ECF No. 1225)**

II. EMERGENCY MATTER:

- 3. **Emergency Motion for Order (I) Approving Entry Into First Lien Exit Facility Commitment Letter and Related Fee Letter, (II) Authorizing Incurrence and Payment of Certain Fees and Costs in Connection Therewith, and (III) Granting Related Relief (ECF No. 1165)**

Status: One party filed a statement of interest and reservation of rights with respect to this matter. The Debtors have not received any other objections or responses to this matter.

Related Document:

- A. Declaration of John-Paul Hanson in Support of Emergency Motion of Debtors for Order (I) Approving Entry Into First Lien Exit Facility Commitment Letter and Related Fee Letter, (II) Authorizing Incurrence and Payment of Certain Fees and Costs in Connection Therewith, and (III) Granting Related Relief (**ECF No. 1166**)

Response:

- B. Ecopetrol America LLC's Statement of Position and Reservation of Rights in Regards to Emergency Motion of Debtors for Order (I) Approving Entry Into First Lien Exit Facility Commitment Letter and Related Fee Letter, (II) Authorizing Incurrence and Payment of Certain Fees and Costs in Connection Therewith, and (III) Granting Related Relief (**ECF No. 1242**)

Witness and Exhibit List:

- C. Debtors' Witness and Exhibit List for Hearing on April 9, 2021 (**ECF No. 1225**)

Dated: April 9, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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Attorneys for Debtors

and Debtors in Possession

Certificate of Service

I hereby certify that, on April 9, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez
Alfredo R. Pérez